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JOHN ASHCROFT
Governor

G. TRACY MEHAN III
Director



STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL QUALITY

P.O. Box 176

CERTIFIED MAIL #P 396 604 161 Jefferson City, MO 65102
RETURN RECEIPT REQUESTED

January 24, 1992

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JAN 30 1992

PRMT SECTION

Mr. Urban Kline
Sylvanus Products, Inc.
40 Merchant St.
St. Genevieve, MO 63670

RE: Container Storage Facility Closure Plan, EPA ID Number MOD092351642
Facility Location: 40 Merchant St., St. Genevieve, MO

Dear Mr. Kline:

Enclosed you will find the comments generated by our consultant's (Burns & McDonnell Waste Consultants, Inc.) review of the closure plan for the above referenced hazardous waste management unit. The review of the closure plan has been conducted to ensure conformance of the plan with 10 CSR 25-7.265 and 40 CFR Part 265 Subpart G. Burns & McDonnell Waste Consultants, Inc. has provided the technical review of the closure plan while the department still maintains approval authority for the closure plan. Please respond to the enclosed comments with a revised closure plan and/or clarifying response within thirty (30) days after receipt of this letter. If you should have any questions, please do not hesitate to call Mr. Ken Volmert of this office at (314) 751-3176. Please note, we may ask that your questions also be discussed with our consultant. If within thirty (30) days after receipt of this comment letter, a revised closure plan and/or adequate response has not been received, the department may approve the existing closure plan with modifications in accordance with the procedures outlined in 40 CFR Part 265.112 (d)(4).

Sincerely,

HAZARDOUS WASTE PROGRAM

Daniel M. Tschirgi

Daniel M. Tschirgi, P.E.
Chief, Hazardous Waste Permits Unit

DMT:kvj

Enclosure

c: Lynn Harrington, P.E., EPA Region VII
Southeast Regional Office



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EMPLOYEE - OWNED
Burns & McDonnell
ENGINEERS - ARCHITECTS - CONSULTANTS

January 10, 1992

Mr. Robert K. Morrison, P.E.
Missouri Department of Natural Resources
Hazardous Waste Program
P.O. Box 176
Jefferson City, MO 65102

Silvanus Products, Inc.
Container Storage Facility Closure Plan
EPA ID Number: MOD092351642
Facility Location: 40 Merchant St., Ste. Genevieve, MO

Dear Mr. Morrison:

Burns & McDonnell Waste Consultants, Inc. has completed a review of the closure plan for the container storage area at the Silvanus Products, Inc. facility, 40 Merchant Street, Ste. Genevieve, Missouri. The review was done in accordance with 10 CSR 25-7.265 and 40 CFR Part 265 Subpart G. This comment letter is submitted in accordance with the contract to provide engineering services we received by letter dated November 20, 1991.

This letter includes the comments resulting from the technical review of the closure plan submitted on September 1, 1982 by Georgia-Pacific Corporation, which owned the facility prior to Silvanus. On May 25, 1984, Georgia-Pacific sent a letter to the Missouri Department of Natural Resources (MDNR) requesting that their generator ID number and interim status be transferred to Silvanus due to sale of the property. As part of the property transfer, Georgia-Pacific removed the waste stored at the facility and shipped it on June 21, 1984, to Chemical Waste Management's facility in Emelle, Alabama. However, no notification was given to the MDNR prior to the removal of the waste nor was any sampling done to confirm a clean closure.

On January 29, 1985, Silvanus requested that the MDNR delete the generator ID number and interim status transferred to them by Georgia-Pacific because they would no longer be generating or storing hazardous waste as defined by RCRA regulations. The MDNR issued a letter on June 27, 1990 explaining why the Silvanus facility was still classified as an interim status treatment, storage, or disposal facility (TSDF). The name and ownership change does not change the fact that the facility is still under interim status. Based on the regulations and the fact that Silvanus has not submitted a revised closure plan, the closure plan submitted by Georgia-Pacific still applies to the facility. The comments with respect to that plan are as follows:

1. The plan does not provide an adequately detailed description of the steps needed to remove or decontaminate all hazardous waste residues and contaminated containment system components, equipment, and structures during final closure. The plan must provide methods for sampling and testing of the concrete floor, the concrete block walls, and any

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significant cracks in the floor, and define the criteria for determining the extent of decontamination necessary to satisfy the closure performance standard in 40 CFR 265.111 and in 10 CSR 25-7.265(2)(G)3 and 4.

It was noted by Silvanus personnel that a new ceiling has been placed in the container storage area and the walls in the storage area painted. The sampling plan must address these changes in the storage area. The testing and sampling requirement to demonstrate closure in conformance with the closure performance standard is contained in 40 CFR 265.112(b)(4).

2. A schedule specifically for closure of the container storage unit must be included in the revised plan. It must specify the total time required to close the unit and the time required for intervening closure activities, which will allow tracking of the progress of partial and final closure as required by 40 CFR 265.112(b)(6). An estimate of the expected year of final closure must also be included as per 40 CFR 265.112(b)(7). The agency notifications required by 40 CFR 265.112(d) and the closure deadlines in 40 CFR 265.113 must be addressed in the closure schedule.
3. All hazardous wastes and hazardous waste residues must be removed at final closure to background levels or to below detection limits for the hazardous waste constituents. Removal of contaminated materials and/or the management of decontamination fluids during final closure may result in the owner or operator becoming a generator of hazardous wastes. The federal regulation 40 CFR 265.114 requires that the waste be handled in accordance with all applicable requirements of Part 262.
4. The revised plan must address the closure certification requirements in 40 CFR 265.115. Within 60 days of completion of final closure, the owner or operator must submit to the agency, by registered mail, a certification that the container storage area has been closed in accordance with the specifications in the approved closure plan. The certification must be signed by the owner or operator and by an independent registered professional engineer.
5. The decontamination of equipment, containment systems, and structures during closure will require various levels of personnel safety as a result of the process used and if air monitoring equipment in the contaminated area indicates that volatile organic compounds are present. The personnel safety procedures that will be necessary during closure should be outlined in the closure plan and should meet all applicable Occupational Safety and Health Act (OSHA) requirements.

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6. The closure plan revisions that result from the above comments, such as the sampling and testing methods, the decontamination procedures, and the certification of closure by an independent registered professional engineer, will significantly change the estimated closure costs presented in the September 1, 1982 plan. Therefore, the cost estimate for closure of the container storage area must be updated to comply with 40 CFR 265.142 and to reflect changes in the plan that result from the above comments.

As part of our technical review, the facility was visited and photographed to document its current status and condition. Copies of the photographs are provided with this letter. Copies of other documentation and forms which support the review are provided as per the contract agreement.

If there are any questions regarding the comments in this letter, please call at (816) 333-4375. We appreciate the opportunity to be of service to the Department.

Sincerely,



Craig W. Borgmeyer, E.I.T.
Project Engineer



Rickie L. Roberts, P.E.
Project Engineer

CWB/RLR/pkw.005
Enclosures